UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	Criminal No. 22cr100/6
v.) Violations:
JONATHAN VAUGHAN, a/k/a "JONATHAN VAUGHN," a/k/a "ASON,"	Counts One, Two and Three: Sex Trafficking by Force, Fraud and Coercion (18 U.S.C. §§ 1591(a) and (b)(1))
Defendant	Counts Four and Five: Transportation of an Individual for Purposes of Prostitution (18 U.S.C. § 2421)
	Count Six: Possession with Intent to Distribute Cocaine
) (21 U.S.C. § 841(a)(1))
	Sex Trafficking Forfeiture Allegation: (18 U.S.C. § 1594(d) and 28 U.S.C. § 2461(c))
	Transportation Forfeiture Allegation: (18 U.S.C. § 2428(a), 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c))
	Drug Forfeiture Allegation: (21 U.S.C. § 853)

INDICTMENT

COUNT ONE

Sex Trafficking by Force, Fraud and Coercion (18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury charges:

From at least in or around June 2019 through in or around September 2019, in the District of Massachusetts, and elsewhere, the defendant,

JONATHAN VAUGHAN, a/k/a "Jonathan Vaughn," a/k/a "ASON,"

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, i.e., Victim 3, whose identity is known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Victim 3 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT TWO

Sex Trafficking by Force, Fraud and Coercion (18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

From in or about May 2021 through in or about October 2021, in the Districts of Massachusetts and New York, and elsewhere, the defendant,

JONATHAN VAUGHAN, a/k/a "Jonathan Vaughn," a/k/a "ASON," did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, i.e., Victim 4, whose identity is known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Victim 4 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT THREE

Sex Trafficking by Force, Fraud and Coercion (18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

From in or about October 3, 2021, through in or about October 13, 2021, in the Districts of Massachusetts and New York, and elsewhere, the defendant,

JONATHAN VAUGHAN, a/k/a "Jonathan Vaughn," a/k/a "ASON," did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, i.e., Victim 5, whose identity is known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Victim 5 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT FOUR Transportation of an Individual for Purposes of Prostitution (18 U.S.C. § 2421)

The Grand Jury further charges:

In or about October 2021, in the Districts of Massachusetts, Connecticut, and elsewhere, the defendant,

JONATHAN VAUGHAN, a/k/a "Jonathan Vaughn," a/k/a "ASON," did knowingly transport an individual, i.e., Victim 4, whose identity is known to the Grand Jury, in interstate commerce, that is, between Massachusetts and Connecticut, with the intent that Victim 4 engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2421.

$\frac{\text{COUNT FIVE}}{\text{Transportation of an Individual for Purposes of Prostitution}}$

(18 U.S.C. § 2421)

The Grand Jury further charges:

In or about October 2021, in the Districts of Massachusetts, New York, and elsewhere, the defendant,

JONATHAN VAUGHAN, a/k/a "Jonathan Vaughn," a/k/a "ASON," did knowingly transport an individual, i.e., Victim 5, whose identity is known to the Grand Jury, in interstate commerce, that is, between Massachusetts and New York, with the intent that Victim 5 engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2421.

COUNT SIX Possession with Intent to Distribute Cocaine (21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about October 13, 2021, in the District of Massachusetts, the defendant,

JONATHAN VAUGHAN, a/k/a "Jonathan Vaughn," a/k/a "ASON,"

did knowingly and intentionally possess with intent to distribute cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

SEX TRAFFICKING FORFEITURE ALLEGATION (18 U.S.C. § 1594(d) and 28 U.S.C. § 2461(c))

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 1591, set forth in Counts One through Three, the defendant,

JONATHAN VAUGHAN, a/k/a "Jonathan Vaughn," a/k/a "ASON," shall forfeit to the United States: (1) the defendant's interest in any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offenses, and any property traceable to such property, pursuant to Title 18, United States Code, Section 1594(d); and (2) any property, real or personal, which constitutes or is derived from any proceeds the defendant obtained, directly or indirectly, as a result of such offenses, and any property traceable to such property, pursuant to Title 18, United States Code, Section 1594(d), and Title 28, United States Code, Section 2461(c).

- 2. If any of the property described in paragraph 1 above, as being forfeitable, as a result of any act or omission of the defendant
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of this Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Sections 1594(d) and Title 28, United States Code, Section 2461(c).

TRANSPORTATION FOR PROSTITUTION FORFEITURE ALLEGATION (18 U.S.C. § 2428(a), 18 U.S.C. § 981(A)(1)(C), and 28 U.S.C. § 2461(c))

3. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 2421, set forth in Counts Four and Five, the defendant,

JONATHAN VAUGHAN, a/k/a "Jonathan Vaughn," a/k/a "ASON," shall forfeit to the United States: (1) the defendant's interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offenses, pursuant to Title 18, United States Code, Section 2428(a); and (2) any property, real or personal, which constitutes or is derived from any proceeds the defendant obtained, directly or indirectly, as a result of such offenses, pursuant to Title 18, United States Code, Section 2428(a), and Title 18, United States Code, Section 2428(a), and Title 18, United States Code, Section 2461(c).

- 4. If any of the property described in paragraph 3, above, as being forfeitable, as a result of any act or omission of the defendant
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of this Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 3 above.

All pursuant to Title 18, United States Code, Sections 2428(a) and 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

<u>DRUG FORFEITURE ALLEGATION</u> (21 U.S.C. § 853)

5. Upon conviction of the offense in violation of Title 21, United States Code, Section 841, set forth in Count Six, the defendant,

JONATHAN VAUGHAN, a/k/a "Jonathan Vaughn," a/k/a "ASON," shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

- 6. If any of the property described in paragraph 5, above, as being forfeitable, as a result of any act or omission of the defendant
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of this Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 5 above.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL

LINDSEY E. WEINSTEIN

ASSISTANT UNITED STATES ATTORNEY

DISTRICT OF MASSACHUSETTS

District of Massachusetts: MARCH <u>31</u>, 2022 Returned into the District by the Grand Jurors and filed.